

## Haklar, James

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**From:** Keith Gagnon, LSRP Consulting <[kgagnon@lsrpconsulting.com](mailto:kgagnon@lsrpconsulting.com)>  
**Sent:** Thursday, July 14, 2016 11:54 AM  
**To:** Haklar, James  
**Subject:** RE: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile  
**Attachments:** Waste Class for Soil Stockpile at Alcoa Edgewater.pdf

The stockpile waste class sampling results are attached. I was not on-site when the pile was first generated, so I'm not 100% positive there's a liner under the pile, but based on how well they've kept the pile covered with plastic, I expect they placed a liner under the pile.

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**From:** Haklar, James [<mailto:Haklar.James@epa.gov>]  
**Sent:** Thursday, July 14, 2016 11:48 AM  
**To:** Keith Gagnon, LSRP Consulting  
**Subject:** Re: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

Thanks Keith. Can you please send us the analytical results for the pile. Also, you mentioned that the pile is covered. Does it have a liner that it's sitting on?

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**From:** Keith Gagnon, LSRP Consulting <[kgagnon@lsrpconsulting.com](mailto:kgagnon@lsrpconsulting.com)>  
**Sent:** Thursday, July 14, 2016 11:18:22 AM  
**To:** Haklar, James  
**Subject:** Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

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- The soil stockpile was initially generated during October 2015.
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Keith

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LSRP Consulting LLC  
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908-419-7918 ♦ [kgagnon@lsrpconsulting.com](mailto:kgagnon@lsrpconsulting.com)  
[www.lsrpconsulting.com](http://www.lsrpconsulting.com)



Accutest New Jersey								2/17/2016 11:02	
Job Number:	JC13575								
Account:	LSRP Consulting, LLC								
Project:	Alcoa Building 12, 734 River Road, Edgewater, NJ								
Project Number:	150176								
Client Sample ID:		COMPOSITE SOILPILE AI020216 BORINGS: AL020216-N1,N2, N3,N4,N5	BORING AL020216-N1	COMPOSITE SOILPILE AI020216 BORINGS: AL020216-S1,S2, S3,S4,S5	BORING AL020216-S1	COMPOSITE SOILPILE AI020216 BORINGS: AL020216-N6,N7, N8,N9,N10	BORING AL020216-N6	COMPOSITE SOILPILE AI020216 BORINGS: AL020216-S6,S7, S8,S9,S10	BORING AL020216-S6
Lab Sample ID:		JC13575-1	JC13575-2	JC13575-3	JC13575-4	JC13575-5	JC13575-6	JC13575-7	JC13575-8
Date Sampled:		2/2/2016	2/2/2016	2/2/2016	2/2/2016	2/2/2016	2/2/2016	2/2/2016	2/2/2016
Matrix:		Soil	Soil	Soil	Soil	Soil	Soil	Soil	Soil
GC Volatiles (SW846 8015C)									
TPH-GRO (C6-C10)	mg/kg	-	ND (2.1)	-	ND (2.1)	-	ND (2.1)	-	ND (2.2)
GC Semi-volatiles (SW846 8015C)									
TPH-DRO (C10-C28)	mg/kg	-	62.5	-	270	-	299	-	319
GC Semi-volatiles (SW846 8082A)									
Aroclor 1016	ug/kg	ND (13)	-	ND (13)	-	ND (12)	-	ND (12)	-
Aroclor 1221	ug/kg	ND (31)	-	ND (31)	-	ND (28)	-	ND (29)	-
Aroclor 1232	ug/kg	ND (16)	-	ND (16)	-	ND (14)	-	ND (15)	-
Aroclor 1242	ug/kg	ND (14)	-	ND (14)	-	ND (13)	-	ND (13)	-
Aroclor 1248	ug/kg	79700	-	65200	-	81300	-	55100	-
Aroclor 1254	ug/kg	ND (22)	-	ND (22)	-	ND (20)	-	ND (20)	-
Aroclor 1260	ug/kg	8010	-	8890	-	8740	-	6140	-
Aroclor 1268	ug/kg	ND (9.6)	-	ND (9.5)	-	ND (8.8)	-	ND (9.0)	-
Aroclor 1262	ug/kg	ND (13)	-	ND (13)	-	ND (12)	-	ND (12)	-
General Chemistry									
Corrosivity as pH	su	8.43 NC	-	8.45 NC	-	8.23 NC	-	8.29 NC	-
Cyanide Reactivity	mg/kg	<11	-	<11	-	<11	-	<11	-
Ignitability (Flashpoint)	Deg. F	>200	-	>200	-	>200	-	>200	-
Solids, Percent	%	88.1	90.2	91.6	88.6	91.2	90.4	88.8	85.8
Sulfide Reactivity	mg/kg	<110	-	<110	-	<110	-	<110	-
GC/MS Volatiles (SW846 8260C)									
Benzene	mg/l	-	ND (0.0012)	-	ND (0.0012)	-	-	-	-
2-Butanone (MEK)	mg/l	-	ND (0.028)	-	ND (0.028)	-	-	-	-
Carbon tetrachloride	mg/l	-	ND (0.0011)	-	ND (0.0011)	-	-	-	-
Chlorobenzene	mg/l	-	ND (0.00093)	-	ND (0.00093)	-	-	-	-
Chloroform	mg/l	-	ND (0.00094)	-	ND (0.00094)	-	-	-	-
1,4-Dichlorobenzene	mg/l	-	ND (0.0014)	-	ND (0.0014)	-	-	-	-
1,2-Dichloroethane	mg/l	-	ND (0.00090)	-	ND (0.00090)	-	-	-	-
1,1-Dichloroethene	mg/l	-	ND (0.0026)	-	ND (0.0026)	-	-	-	-
Tetrachloroethene	mg/l	-	ND (0.0020)	-	ND (0.0020)	-	-	-	-
Trichloroethene	mg/l	-	ND (0.0011)	-	ND (0.0011)	-	-	-	-
Vinyl chloride	mg/l	-	ND (0.00074)	-	ND (0.00074)	-	-	-	-
GC/MS Semi-volatiles (SW846 8270D)									
2-Methylphenol	mg/l	ND (0.0082)	-	ND (0.0082)	-	-	-	-	-
3&4-Methylphenol	mg/l	0.0189 J	-	ND (0.0067)	-	-	-	-	-
Pentachlorophenol	mg/l	ND (0.014)	-	ND (0.014)	-	-	-	-	-
2,4,5-Trichlorophenol	mg/l	ND (0.015)	-	ND (0.015)	-	-	-	-	-
2,4,6-Trichlorophenol	mg/l	ND (0.014)	-	ND (0.014)	-	-	-	-	-
1,4-Dichlorobenzene	mg/l	ND (0.0023)	-	ND (0.0023)	-	-	-	-	-
2,4-Dinitrotoluene	mg/l	ND (0.0026)	-	ND (0.0026)	-	-	-	-	-
Hexachlorobenzene	mg/l	ND (0.0042)	-	ND (0.0042)	-	-	-	-	-
Hexachlorobutadiene	mg/l	ND (0.0036)	-	ND (0.0036)	-	-	-	-	-
Hexachloroethane	mg/l	ND (0.0022)	-	ND (0.0022)	-	-	-	-	-
Nitrobenzene	mg/l	ND (0.0046)	-	ND (0.0046)	-	-	-	-	-
Pyridine	mg/l	ND (0.0027)	-	ND (0.0027)	-	-	-	-	-
Metals Analysis									
Arsenic	mg/l	<0.50	-	<0.50	-	-	-	-	-
Barium	mg/l	<1.0	-	<1.0	-	-	-	-	-
Cadmium	mg/l	<0.025	-	<0.025	-	-	-	-	-
Chromium	mg/l	<0.050	-	<0.050	-	-	-	-	-
Lead	mg/l	<0.50	-	<0.50	-	-	-	-	-
Mercury	mg/l	<0.00020	-	<0.00020	-	-	-	-	-
Selenium	mg/l	<0.50	-	<0.50	-	-	-	-	-
Silver	mg/l	<0.050	-	<0.050	-	-	-	-	-



## Haklar, James

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**From:** Haklar, James  
**Sent:** Thursday, July 14, 2016 11:48 AM  
**To:** Keith Gagnon, LSRP Consulting  
**Subject:** Re: Former Alcoa Building 12, Edgewater, NJ - Soil Stockpile

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[www.lsrpconsulting.com](http://www.lsrpconsulting.com)



## Haklar, James

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**From:** Haklar, James  
**Sent:** Tuesday, July 05, 2016 11:46 AM  
**To:** 'Keith Gagnon, LSRP Consulting'  
**Subject:** RE: Former Alcoa Building 12, Stormwater Manhole Sampling Results

Hi Keith,

I hope your vacation went well. Let's talk tomorrow at 2:00.

Jim

---

**From:** Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Tuesday, July 05, 2016 11:43 AM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Subject:** RE: Former Alcoa Building 12, Stormwater Manhole Sampling Results

Jim, how's today (Tuesday, 5<sup>th</sup>) anytime between 1 and 3, or tomorrow (Wednesday, 6<sup>th</sup>) anytime between 10 and 3?  
Keith

---

**From:** Haklar, James [mailto:Haklar.James@epa.gov]  
**Sent:** Monday, June 27, 2016 3:09 PM  
**To:** Keith Gagnon, LSRP Consulting  
**Subject:** RE: Former Alcoa Building 12, Stormwater Manhole Sampling Results

Keith,

Aside from Monday (the 4<sup>th</sup>) I'll be in all week from 7:00 – 3:30 so just let me know what day and time you wish to talk.

Also, I want to give you a heads-up that we are preparing to send a letter to North River Mews regarding our ongoing concern that redevelopment of the Site has continued without authorization of the PCB cleanup work (i.e., issuance of a risk-based approval). I will send you a copy of the letter once it is signed.

Jim

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**From:** Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Monday, June 27, 2016 1:41 PM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Subject:** Re: Former Alcoa Building 12, Stormwater Manhole Sampling Results

Jim, I'm traveling and thought I'd be able to have a call with you on Tues or Wed but the cell service is spotty and can't be sure I'll have service. I'd like to reschedule the call for next week if ok with you. I'm available Tues, Wed or Fri next week, after the 4th.

Keith Gagnon  
LSRP Consulting  
11 Lake Michigan Drive  
Little Egg Harbor Twp, NJ 08087  
908-419-7918

On Jun 27, 2016, at 10:47 AM, Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)> wrote:

Hi Keith,

How about either tomorrow afternoon (between 1:30 and 3:30) or Wednesday afternoon (between 2:00 and 4:30)?

Jim

---

**From:** Keith Gagnon, LSRP Consulting [<mailto:kgagnon@lsrpconsulting.com>]  
**Sent:** Thursday, June 23, 2016 2:26 PM  
**To:** Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)>  
**Subject:** Former Alcoa Building 12, Stormwater Manhole Sampling Results

Jim, as mentioned in my voice mail message, re former Alcoa Building 12, we have the PCB sampling results from the two stormwater manholes and I would like to discuss the findings with you. I'm on vacation next week, but would like to schedule a call with you. I can make myself available in the afternoon on Monday, Tuesday or Wednesday (6/27-29) if that's OK with you. Please let me know what day and time is good.

Thank you, Keith

*I will be on vacation from June 24 to July 6 with limited access to email.*

Keith Gagnon, LSRP  
LSRP Consulting LLC  
11 Lake Michigan Drive, Little Egg Harbor Twp, NJ 08087  
908-419-7918 ♦ [kgagnon@lsrpconsulting.com](mailto:kgagnon@lsrpconsulting.com)  
[www.lsrpconsulting.com](http://www.lsrpconsulting.com)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
EDISON, NEW JERSEY 08837

**JUN 28 2016**

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

**Article Number: 7011 2970 0003 2009 0438**

Mr. Fred A. Daibes  
Managing Member  
North River Mews Associates LLC  
1000 Portside Drive  
Edgewater, New Jersey 07020

**Re: Former Alcoa Building 12  
Borough of Edgewater, New Jersey**

Dear Mr. Daibes:

This letter is in reference to the March 5, 2015 document entitled “Remedial Investigation/Remedial Action Report/Remedial Action Workplan” (Workplan), prepared and submitted by Pennjersey Environmental Consulting (Pennjersey) on behalf of North River Mews Associates, LLC (North River Mews). The Workplan presents an application for a risk-based cleanup, under 40 CFR 761.61(c), of polychlorinated biphenyls (PCBs) present at the former Alcoa Building 12 property located at 660 River Road in Edgewater, New Jersey (the Site).

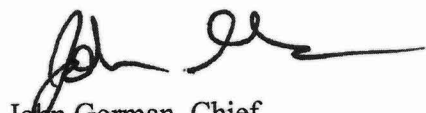
By letter dated July 27, 2015, the United States Environmental Protection Agency (EPA) provided comments on the Workplan to Pennjersey. On August 20, 2015 EPA was informed by LSRP Consulting LLC (LSRP Consulting) that it was working with the owner of the property to complete the PCB risk-based cleanup (Pennjersey notified EPA on August 26, 2015 that its relationship with North River Mews had been terminated). Since that time EPA has been communicating with LSRP Consulting, both verbally and through electronic correspondence, to resolve issues associated with the cleanup. However, to date EPA has not received a formal submission that fully addresses the Agency’s concerns as presented in our July 27, 2015 correspondence.

Please note that until all of EPA’s comments are fully addressed, the Agency cannot proceed with our review and potential issuance of any approval for the risk-based disposal of PCBs at the Site. Furthermore, as EPA previously explained to Pennjersey in correspondence dated June 27, 2014 (regarding prior PCB remediation work at the Site) we are concerned that redevelopment of the Site has continued without authorization of the PCB cleanup work. Please be advised that

North River Mews is proceeding at risk of enforcement if the cleanup work, which includes proposed capping of PCB contaminated soil with the building slab as a component of the overall redevelopment, is completed without formal Agency approval. Until our comments are addressed, EPA cannot determine whether approval for such work could ultimately be issued, and any PCBs that remain on the Site would be in violation of the disposal rules and subject to penalty and/or removal.

If you have any questions, please contact James Haklar at (732) 906-6817 or at [haklar.james@epa.gov](mailto:haklar.james@epa.gov).

Sincerely yours,

A handwritten signature in black ink, appearing to read 'John Gorman', with a long horizontal flourish extending to the right.

John Gorman, Chief  
Pesticides and Toxic Substances Branch

cc: Kevin Schick, New Jersey Department of Environmental Protection  
Keith Gagnon, LSRP Consulting LLC  
Timothy Corrison, Esq., Connell Foley LLP  
Roger Ferguson, Pennjersey Environmental Consulting

## Haklar, James

---

**From:** Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>  
**Sent:** Thursday, June 23, 2016 2:26 PM  
**To:** Haklar, James  
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## Haklar, James

---

**From:** Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>  
**Sent:** Tuesday, April 12, 2016 3:27 PM  
**To:** Haklar, James  
**Subject:** RE: Keith - Are you around tomorrow am? Let's talk then.  
**Attachments:** Edgewater Cemetery Map.pdf

I will call you closer to 9. Attached is a DRAFT map of the cemetery with a 20 x 20 grid, for our discussion.

---

**From:** Haklar, James [mailto:Haklar.James@epa.gov]  
**Sent:** Tuesday, April 12, 2016 3:14 PM  
**To:** Keith Gagnon, LSRP Consulting  
**Subject:** RE: Keith - Are you around tomorrow am? Let's talk then.

That's good. I have a meeting at 10:00 so even if you call any time between 9:00 and 9:30 then that would be fine as well. Sorry I can't talk today; had a root canal done this morning.

---

**From:** Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Tuesday, April 12, 2016 3:09 PM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Subject:** RE: Keith - Are you around tomorrow am? Let's talk then.

Yes, can I call you around 9:30?

---

**From:** Haklar, James [mailto:Haklar.James@epa.gov]  
**Sent:** Tuesday, April 12, 2016 3:04 PM  
**To:** Keith Gagnon, LSRP Consulting  
**Subject:** Keith - Are you around tomorrow am? Let's talk then.





TAX LOT 2  
BLOCK 74  
EDGEWATER CEMETERY

ASBESTOS  
LOT 1.02 BLOCK 74  
(SEE DETAIL)

PROPERTY LINE (TYP)

EXTENT OF FORMER ALCOA BUILDING

TAX LOT 1.02  
BLOCK 74  
BUILDING

MAP SOURCES  
1) NEW JERSEY DEPARTMENT OF ENVIRONMENTAL  
CONSERVATION (JUNE 2015)  
2) BOROUGH OF EDGEWATER TAX MAPS

0 7.5 15 30  
SCALE: 1"=15'

LSRP CONSULTING	
11 Lake Washington Drive, Little Egg Harbor, NJ 08043	
Proposed Soil Sample Locations	
Edgewater Cemetery	
Former Alcoa Building 12	
660 River Road, Edgewater, NJ 07020	
Project 150176	April 2016
Figure 3	



## Haklar, James

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**From:** Haklar, James  
**Sent:** Thursday, March 31, 2016 10:48 AM  
**To:** 'Keith Gagnon, LSRP Consulting'  
**Cc:** Finnegan, Ann; 'Timothy E. Corrison'  
**Subject:** Alcoa Building 12 Property, Edgewater, NJ

Keith,

This message serves as a follow-up to yesterday's discussion regarding the Alcoa Building 12 property in Edgewater. As we discussed, Mr. Timothy Corrison (of Connell Foley LLP) verbally informed the United States Environmental Protection Agency (EPA) that the Borough of Edgewater will not undertake the sampling of soil in Edgewater Cemetery. EPA therefore expects North River Mews Associates, LLC. (North River Mews) to expeditiously perform this work in accordance with the Agency's July 27, 2015 correspondence to Pennjersey Environmental Consulting (North River Mews' former consultant).

Furthermore, as we discussed with Ann Finnegan (EPA Region 2 PCB Enforcement Coordinator), the PCBs currently present (i.e., disposed) at the Alcoa Building 12 property that are above regulatory cleanup levels are unauthorized until EPA issues a formal risk-based PCB cleanup and disposal approval. In order for the Agency to process North River Mews' March 5, 2015 application for a risk-based approval your client must provide documentation that fully addresses all of the Agency's concerns as presented in EPA's July 27, 2015 correspondence.

Thank you for your attention to this matter. Please feel free to contact me if you have any questions.

Sincerely yours,

Jim Haklar

James S. Haklar, Ph.D.  
Sr. PCB Disposal Specialist  
Division of Enforcement and Compliance Assistance

(732) 906-6817



## Haklar, James

---

**From:** Keith Gagnon, LSRP Consulting <kgagnon@lsrpconsulting.com>  
**Sent:** Tuesday, February 02, 2016 2:20 PM  
**To:** Haklar, James  
**Subject:** Concrete sampling and disposal, PCBs, Former Alcoa Building 12, Edgewater, NJ  
**Attachments:** Former Alcoa Bldg 12 - concrete floor sampling and disposal from 1999 1018 RAR for Building 12.pdf

Jim, following up our conversation last week regarding crushed concrete backfill at the former Alcoa Building 12 in Edgewater, specifically whether the original PCB concentrations in the concrete source material were greater than 500 ppm, I reviewed the previous reports for the site.

The attached portion of the October 1999 Remedial Action Report for Building 12 discusses how the concrete floors were tested for PCBs and how the portions of the floors with PCB concentrations greater than 0.5 ppm were removed and either disposed of off-site at Model City (concentrations greater than 50 ppm) or crushed and re-used off-site for road bed material (concentrations between 0.5 and 50 ppm).

The report also provides the PCB sampling results for the walls. All wall sampling results were 1 ppm or less.

Based on this report, any remaining concrete floors or walls that were crushed and re-used on site for backfill would not have contained PCB concentrations greater than 500 ppm.

Keith

Keith Gagnon, LSRP  
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# Remedial Investigation Report

## Remedial Action Report

Former ALCOA Facility – Building 12

(NJDEP #97-6-10-0037-28)

700 River Road

Edgewater, New Jersey 07020

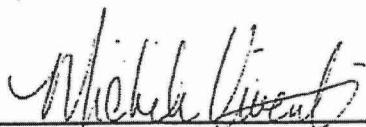
Prepared for:

North River Mews Associates, L.L.C.

725 River Road

Edgewater, New Jersey 07020

Prepared by:



Michele Viventi, Environmental Scientist



Mark London, Vice President/CIO

**ENVIRO-SCIENCES, INC.**

111 Howard Boulevard, Suite 108

Mt. Arlington, New Jersey 07856

(973) 398-8183 – (973) 398-8037 (F)



## **REMEDIAL INVESTIGATION REPORT REMEDIAL ACTION WORKPLAN**

**River Mews Associates  
(Building 12 - Former Alcoa Facility)  
700 River Road  
Edgewater, New Jersey 07020  
(NJDEP #97-6-10-0037-28)**

### **1.0 INTRODUCTION**

North River Mews Associates (NRMA) currently owns the subject property, located at 700 River Road in the City of Edgewater, Bergen County, New Jersey (see Figure 1). The property was formerly owned by the Aluminum Company of America (Alcoa), a manufacturer of sheet metal and airplane components from the early 1920s to 1968. In June 1997, NRMA entered into Memorandum of Agreement (MOA) with the New Jersey Department of Environmental Protection (NJDEP), accepting responsibility for performing remediation of the PCB-impacted concrete structural material on the subject site.

On February 3, 1999, NRMA subdivided the subject property, making the portion of the site containing Building 12 a separate parcel. On February 18, 1999, NRMA delivered NJDEP a Remedial Action Report that covered the entire site, except for Building 12. A No Further Action (NFA) was issued by NJDEP on March 9, 1999, for this portion of the subject property.

Enviro-Sciences, Inc. (Enviro-Sciences) was retained by North River Mews Associates, L.L.C. (NRMA) to prepare this Remedial Investigation Report (RIR) and subsequent Remedial Action Workplan (RAW) for Building 12. This report provides information relevant to Building 12 only.

This RIR describes the results of Enviro-Sciences' sampling program that defined areas within Building 12 that potentially contained polychlorinated biphenyl (PCB) contaminated walls and floors. This report also provides information pertaining to the proposed remediation of the walls. This remediation would occur when the structure is rehabilitated as a parking structure.

The PCB sampling plan for the walls was prepared in consultation with both NJDEP and the US Environmental Protection Agency (EPA) (Appendix A). The plan was formulated because PCBs were identified in specific areas of the floor in Building 12 by Woodward-Clyde (WCC) in a November 1998 report.

In response to this concern, the concrete flooring within Building 12 was examined. The floor was divided into "panels" defined by the supporting columns of the building. Panels found to have PCB concentrations in excess of 0.49 parts per million (ppm) were carefully removed. The contaminated concrete was segregated into two groups. Concrete with concentrations in excess of 50 ppm of PCBs was stored onsite for a brief time. Subsequently, this material was disposed of in a secure landfill in Model City, New York. Concrete found to have PCB concentrations between 0.5 ppm and 50 ppm was crushed, then removed from the property and used as road base.

The NJDEP had also expressed concern about the walls in Building 12. It was believed that the walls may have also contain PCBs. There had never been any testing of the walls. NJDEP also expressed concern about the reuse of the structure for parking, to be located below a residential tower.

In June 1998, Enviro-Sciences submitted a proposed wipe-sampling plan for NJDEP review. During the review process, guidance was sought from the US EPA regarding the concrete reuse issues. Based on US

EPA comments, the sampling plan was modified to substitute core samples for wipe samples. Both the NJDEP and US EPA comments were incorporated into the plan executed to prepare this RIR. The NJDEP and US EPA approved the core sampling plan in letters to Enviro-Sciences dated August 5, 1999, and October 7, 1999, respectively.

This RIR discusses the sampling results from both the floors and walls of Building 12. In addition, it proposes a Remedial Action Workplan (RAW) to complete the remediation of Building 12. This document was prepared in accordance with the NJDEP Technical Requirements for Site Remediation (N.J.A.C. 7:26E) and Guidance Document for the Remediation of Contaminated Soils (June 1996).

To facilitate discussion of the information presented in this RAW, a general description of the subject property and prior sampling are presented in Section 2.0. Remedial standards are defined in Section 3.0, followed by Section 4.0 that discusses the implemented sampling plan. Section 5.0 provides the Remedial Action Workplan to be implemented to complete the project. Section 6.0 contains the Health and Safety Plan used during the sample collection. If needed for review purposes, a full discussion of site historic studies can be found in the February 1999 RAR.

## 4.0 DESCRIPTION OF REMEDIAL INVESTIGATION

Building 12 is currently standing vacant and partially rehabilitated. All the interior walls have been removed. The exterior walls enclose a space containing two stories. A floor divides this space into two stories. The first story includes a partial basement that underlies the eastern portion of the building. The second story runs the entire length of the building.

### 4.1 The Floor

The floor in this building was constructed of a two-way system of flat slabs. The slabs were supported on mushroom columns that supported the drop-in panels. This construction technique was similar to the construction technique used in the other buildings on the site. Each slab consisted of reinforced concrete, typically twelve inches in thickness. The structural bays, as defined by the columns, measure 19 feet by 16 feet.

The floor was divided into "panels" defined by the supporting columns of the building. The floor panels were sampled and those found to be contaminated with PCBs in excess of the 0.49 ppm criteria have been removed by jack hammering and selective concrete cutting. Panels found to have PCB levels between 0.49 and 5.0 ppm were crushed and recycled as roadway fill. Panels with contamination in excess of 5.0 ppm were taken to a secure landfill located in Model City, New York. The floor sampling results are included as Table 1. The manifests for the entire site were submitted to the NJDEP as Appendix 6 of the February 18, 1999, RAR.

### 4.2 Exterior Walls

On September 17, 1999, the exterior walls of Building 12 were tested to determine if they were contaminated with PCBs. The program consisted of collecting a series of ten core samples.

The cores were collected from approximately one foot above the intersection of the wall and floor. They were biased towards areas of visible staining or discoloration. The differentiation of walls either suspected or not suspected of having PCB contamination was based on their locations. Walls adjacent to floor panels that were removed, were determined to be suspect of having contamination. Walls adjacent to existing floor panels were determined to be less contaminated. Five cores were collected from exterior wall panels suspected of having elevated concentrations of PCBs. In addition, five additional cores were taken from exterior walls suspected of having minimal PCB contamination.

After collection of each core, sub-samples were taken: the first 2-inch and the second 2-inch segments were harvested. Each was subsequently crushed prior to being sent to the laboratory. The proposed sampling plan (Appendix 1) was implemented after receiving NJDEP approval. No permits were required to implement the plan.

The sampling results are presented in Table 2 and Figure 3. They indicate that all of the cores collected from suspected areas without contamination had PCB concentrations below the 0.49 ppm criteria, both in the surficial and 2-inch depth samples. As for the areas that were suspected as being contaminated, three of the five surficial samples had PCB concentrations slightly in excess of the 0.49 ppm criteria. Only one of these samples exhibited contamination in the 2-inch depth section. This last sample was the most visibly stained.

## Haklar, James

---

**From:** Haklar, James  
**Sent:** Friday, January 15, 2016 11:23 AM  
**To:** 'Keith Gagnon, LSRP Consulting'  
**Subject:** FW: Former Alcoa Building 12 - USEPA ID No. NJD981559149 NJDEP PI No. 023713 & 620276  
**Attachments:** Figure 16 Remaining Soils.pdf; 20160114 Alcoa Building 12 Response to USEPA.pdf

Keith – As we discussed.

Jim

James S. Haklar, Ph.D.  
Sr. PCB Disposal Specialist  
Division of Enforcement and Compliance Assistance

(732) 906-6817



**Haklar, James**

---

**From:** Haklar, James  
**Sent:** Friday, January 15, 2016 11:11 AM  
**To:** 'Keith Gagnon, LSRP Consulting'  
**Subject:** Alcoa Sampling Results

Keith,

Please call me when you have a chance. We need to discuss the PCB soil concentrations.

Thanks,

Jim





**744 Millford Warren Glen Road  
Millford, NJ 08848  
(888) 679-7462  
(908) 329-6060  
[www.pennjerseyenv.com](http://www.pennjerseyenv.com)**

Sent Electronically

January 14, 2016

Mr. James Haklar, Ph.D.  
Pesticides and Toxic Substances Branch  
United States Environmental Protection Agency Region 2  
Mail Code: MS105  
2890 Woodbridge Avenue  
Edison, New Jersey 08837-3679

Re: Former Alcoa Building 12  
a.k.a. A.P. New Jersey  
660 River Road  
Edgewater, Bergen County  
Block 74 Lot 1.02B  
USEPA ID No. NJD981559149  
NJDEP PI No. 023713 & 620276

Dear Dr. Haklar:

It was a pleasure to have spoken with you regarding the above site. This correspondence shall serve to confirm our telephone conversations of January 6 and 8, 2016.

Pennjersey Environmental Consulting (PEC) was engaged on behalf of Daibes Enterprises, Waterside Construction, LLC, 38 COAH Associates, LLC, and North Riverside Mews Associates, LLC between October 9, 2013 and August 11, 2015. During this time, PEC was responsible for observing the remediation, post excavation soil sampling, and reporting relating to the remediation of polychlorinated biphenyls (PCBs) and other contaminants of concern related to two former underground storage tanks (USTs). This effort, however, was only a part of a larger effort being made by various contractors, including Waterside Construction, LLC and Schulman Industries (the latter working on behalf of The Heaven, LLC) to redevelop the site in preparation for the construction of the Heavenly Spa. As such, although the construction contractors operated continuously on the site during the time of our engagement, PEC was not present continuously on the site to observe their actions and can only verify those activities that were directly observed during our presence on the site.

At the Agency's request, PEC included a figure in our March 18, 2015 Remedial Investigation / Remedial Action Report / Remedial Action Workplan (RI/RAR/RAWP) that showed the data for the soil sample locations remaining on the site following the completion of the remediation and the installation of the Interim Remedial Measure (IRM). This figure, designated in the RI/RAR/RAWP as Figure 16 and attached hereto, indicated four soil sample locations where the remaining soils exceeded 500 milligrams per kilogram (mg/kg) total PCBs. These data have been summarized below.

Sample ID	Date	Elevation ft MSL	Observed Depth ft bgs	Total PCBs mg/kg
PS-001	2/26/14	37	3.5	1,122.2
PS-002	2/26/14	37	3.5	835.1
PE-061	3/21/14	16	20	687 J+
PE-063	3/21/14	16	20	735 J+

In the above table, we have indicated both the sample elevation in feet mean sea level (ft MSL) and the contemporaneous observed depth in feet below ground surface (ft bgs). Figure 16 showed the sample elevations in ft MSL, while the observed depths in ft bgs were referenced elsewhere in the text as well as Figures 5 and 6 of the RI/RAR/RAWP.

#### Soil Samples PS-001 and PS-002

Soil samples PS-001 and PS-002 were collected on February 26, 2014 from locations on the excavation sidewall immediately below the protruding ends of the product piping. The result of the duplicate sample DUP-004, collected from location PS-001, was significantly less than the compliance sample, indicating the heterogeneity of the soil matrix. These locations were shown on Figures 6 and 16. These soils were subsequently excavated on March 18, 2018; however, a new sample could not be collected immediately thereafter as PEC judged that it was not safe to enter the area, i.e., it would have violated the Occupational Safety and Health Administration excavation safety standard (29 CFR 1926 Subpart P) and it was not feasible to collect a sample from the side wall using a backhoe bucket because of the elevation. Shortly thereafter, the construction contractor, Schulman Industries, stabilized the excavation sidewall by constructing a concrete block retaining wall along the face of it, separating the area of the former basement floor and UST vault from the excavation wall and the adjoining property and thus preventing access for the collection of soil samples. See section 3.2.4.2 of the RI/RAR/RAWP for a discussion of this sampling event; the concrete block wall is shown on both Figures 6 and 16.

After the area behind this retaining wall was backfilled by Schulman Industries with materials from the site that included the contaminated recycled concrete aggregate, soil boring SB-020 was installed on June 25, 2014 between former sample locations PS-001 and PS-002. The soil boring locations are also shown on Figure 10. The results of the three soil samples collected, which ranged from < 0.03 to 151.9 mg/kg total PCBs, indicated that the concentration of PCBs had been removed to less than 500 mg/kg, as discussed in section 3.3.2 of the RI/RAR/RAWP. As a result, soil sample locations PS-001 and PS-002 should not have been shown on Figure 16. We note that the data for soil sample PS-001 and PS-002 were not included in the calculation of the 95<sup>th</sup> upper confidence limit of the mean for total PCBs used in the site specific risk assessment presented in section 4.0 of the RI/RAR/RAWP. We apologize for any confusion that this may have caused. To our knowledge, these soils were not re-excavated after PEC collected the soil samples from boring SB-020 in June 2014.

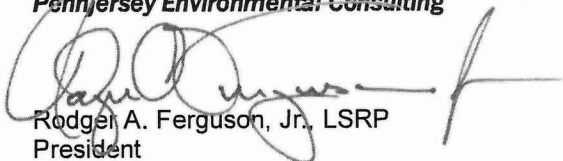
#### Soil samples PE-061 and PE-063

Soil samples PE-061 and PE-063 were post excavation soil samples related to the former USTs that were collected on March 21, 2014 from the surface of the competent fractured bedrock at depth of approximately 20 ft bgs. Further vertical excavation was not feasible, but there was no visual indication oil staining. These sample locations were shown on Figure 8 and Figure 16. Subsequent to PEC's collection of these samples, PEC observed that the UST excavation had been backfilled with clean fill material up to the existing grade. The IRM was later constructed on top of this backfill using the geotextile fabric and six inches of crushed stone. Both of these efforts were reported in Section 3.5.1 of the RI/RAR/RAWP. The IRM was completed on September 12, 2014 and the site released to general construction on September 17, 2014. PEC did not at any time subsequent to the collection of post excavation soil samples PE-061 and PE-063 observe evidence that additional soil had been excavated from that area of the site. To our knowledge, these soils were not re-excavated after collection of the post excavation soil samples PE-061 and PE-063 in March 2014.

Mr. James Haklar, Ph.D.  
January 14, 2016  
Page 3

We trust that this discussion helps clarify your understanding of the issues raised. Thank you for your attention to this matter. Should you have any questions or comments, please feel free to contact me at (908) 329-6060 or [rferguson@pennjerseyenv.com](mailto:rferguson@pennjerseyenv.com).

Sincerely yours,  
**PennJersey Environmental Consulting**



Rodger A. Ferguson, Jr., LSRP  
President  
Licensed Site Remediation Professional No. 573794

Enc.

cc: Mr. John M. Scagnelli, Esq.  
Scarinci Hollenbeck LLC

Mr. Kevin Schick  
NJDEP Bureau of Environmental Evaluation & Risk Assessment







## Haklar, James

---

**From:** Haklar, James  
**Sent:** Wednesday, January 06, 2016 2:25 PM  
**To:** 'Keith Gagnon, LSRP Consulting'  
**Subject:** RE: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Thanks Keith. I'm still looking into this and we may be having a discussion about it in the near future.

Jim

---

**From:** Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Tuesday, January 05, 2016 12:30 PM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Subject:** RE: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Yes, the samples were collected at the same location and depths as the previous samples (the locations were surveyed prior to sampling to ensure the same location and depth). But please recall the resampling was performed because the text of the report said the soils at the four resample locations were excavated but the map of remaining PCB concentrations included the samples. The resampling was done to confirm the soils were excavated and that the map was in error, which the recent results demonstrate to be the case.

---

**From:** Haklar, James [mailto:Haklar.James@epa.gov]  
**Sent:** Tuesday, January 05, 2016 11:05 AM  
**To:** Keith Gagnon, LSRP Consulting  
**Subject:** RE: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Thanks. I'm still concerned about the fact that the prior LSRP identified PCBs > 500 ppm. The new samples were collected in the same locations/depths as the original samples, correct? I'm also concerned that this could be a situation where samples were initially collected, soil was moved around (so PCBs were diluted) and then your sampling shows < 500 ppm.

---

**From:** Keith Gagnon, LSRP Consulting [mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Sunday, January 03, 2016 4:31 PM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Subject:** RE: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Jim, status update – the soil samples were all below 500 ppm. The lab report is undergoing 3<sup>rd</sup>-party validation.  
Keith

---

**From:** Keith Gagnon, LSRP Consulting  
**Sent:** Friday, November 27, 2015 2:53 PM  
**To:** Haklar, James  
**Subject:** Re: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Yes. I will call you.  
Keith Gagnon  
LSRP Consulting  
11 Lake Michigan Drive

Little Egg Harbor Twp, NJ 08087  
908-419-7918

On Nov 27, 2015, at 9:54 AM, Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)> wrote:  
That's good for me as well. How about 9:00?

---

**From:** Keith Gagnon, LSRP Consulting [<mailto:kgagnon@lsrpconsulting.com>]  
**Sent:** Thursday, November 26, 2015 7:10 AM  
**To:** Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)>  
**Subject:** Re: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Next Friday anytime is good for me.

Keith Gagnon  
LSRP Consulting LLC  
908-419-7918

On Nov 25, 2015, at 1:26 PM, Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)> wrote:  
Let's catch up next week. What day is good for you? I'll be out of the office on Tuesday and Wednesday.

---

**From:** Keith Gagnon, LSRP Consulting [<mailto:kgagnon@lsrpconsulting.com>]  
**Sent:** Wednesday, November 25, 2015 11:50 AM  
**To:** Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)>  
**Subject:** Re: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

We were waiting for some redevelopment work to be done. Soil sampling scheduled for December and the other work in Jan after we get the soil results back.

Keith Gagnon  
LSRP Consulting  
11 Lake Michigan Drive  
Little Egg Harbor Twp, NJ 08087  
908-419-7918

On Nov 25, 2015, at 11:03 AM, Haklar, James <[Haklar.James@epa.gov](mailto:Haklar.James@epa.gov)> wrote:  
Hi Keith – What is the status of the work? I can't work on the approval until I see your report on the follow-up activities.

Thanks,

Jim

James S. Haklar, Ph.D.  
Sr. PCB Disposal Specialist  
Division of Enforcement and Compliance Assistance

(732) 906-6817

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**From:** Keith Gagnon, LSRP Consulting  
[mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Thursday, October 15, 2015 10:39 AM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Cc:** Kevin Schick (Kevin.Schick@dep.nj.gov) <Kevin.Schick@dep.nj.gov>  
**Subject:** RE: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Received, thank you.

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**From:** Haklar, James [mailto:Haklar.James@epa.gov]  
**Sent:** Thursday, October 15, 2015 9:37 AM  
**To:** Keith Gagnon, LSRP Consulting  
**Cc:** Kevin Schick (Kevin.Schick@dep.nj.gov)  
**Subject:** RE: Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Keith,

I have reviewed your correspondence and I have no further comments on the issues discussed therein.

Sincerely yours,

Jim Haklar

James S. Haklar, Ph.D.  
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**From:** Keith Gagnon, LSRP Consulting  
[mailto:kgagnon@lsrpconsulting.com]  
**Sent:** Wednesday, September 30, 2015 4:24 PM  
**To:** Haklar, James <Haklar.James@epa.gov>  
**Cc:** Kevin Schick (Kevin.Schick@dep.nj.gov) <Kevin.Schick@dep.nj.gov>  
**Subject:** Former Alcoa Building 12, Edgewater NJ - Response to EPA Letter July 27, 2015

Jim, on behalf of North River Mews, the response to the USEPA's letter dated 27, 2015 regarding the Former Alcoa Building 12 in Edgewater, New Jersey is attached.

Thank you, Keith

Keith Gagnon, LSRP  
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**Sent:** Wednesday, November 25, 2015 11:50 AM

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